



NIELSEN MERKSAMER
PARRINELLO GROSS & LEONI LLP

2350 Kerner Boulevard, Suite 250
San Rafael, California 94901

t: 415.389.6800
f: 415.388.6874

2012 DEC 10 PM 2:32

December 3, 2012
OFFICE OF
CONFIDENTIAL

Anthony Herman
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Request for Dismissal of Complaint
Against Jim C. Walton; MUR 6689

Dear Mr. Herman:

We represent Jim Walton in connection with MUR 6689. The enclosed letter from Caplin & Drysdale was previously submitted on behalf of John McCain 2008, Inc. in connection with MUR 6689. We request that it also be included as a part of Mr. Walton's response, as it makes clear that Mr. Walton did not make any over the limit contributions.

Should you have any questions, please feel free to contact me at slucas@nmgovlaw.com or (415) 389-6800.

Sincerely,

Steven S. Lucas

SSL/sfr
Enclosure
7336.01

Sacramento Office
1415 L Street, Suite 1200 | Sacramento, California 95814
t: 916.446.6752 | f: 916.446.6106 | www.nmgovlaw.com

13044334174



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 6689

NAME OF COUNSEL: Steven S. Lucas

FIRM: Nielsen Merksamer Parrinello Gross & Leoni LLP

ADDRESS: 2350 Kerner Boulevard, Suite 250

San Rafael, CA 94901

TELEPHONE- OFFICE (415) 389-6800

FAX (415) 388-6874

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/20/2012
Date

[Signature]
Respondent/Agent-Signature

Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Jim C. Walton

MAILING ADDRESS: PO Box 1860
(Please Print)

Bentonville, AR 72712

TELEPHONE- HOME

BUSINESS (479) 464-1500

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

Rev. 2006

13044334175